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U.S. DISTRICT COURT

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U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

2024 FEB -5 AM 11:46

UNITED STATES DISTRICT COURT THE CLERK

FRANK EDWARD KREEGER III

SARPY COUNTY SHERIFFS;  
DOUGLAS COUNTY JAIL

8:24CV43

## I. Jurisdiction & VENUE

1. This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation under cover of state law, of rights secured by the Constitution of the United States. The courts have jurisdiction under 28 U.S.C. Section 1331 and 1333. Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 & 2202. Plaintiff claims for injunctive relief are authorized by 28 U.S.C. Section 2283 & 2284 and rule 65 of the Federal Rules of Civil Procedure.

2. The Sarpy County/Douglas County is an appropriate venue under 28 U.S.C. Section 1331 because it is where the events giving rise to this claim occurred.

## II

3. Plaintiff [FRANK EDWARD KREEGER III] is and was at all times mentioned herein in the custody and alleged well-being of the State of Nebraska (Sarpy Co. Sheriff's) (Douglas County Jail)

III X

4) Douglas Co. Jail & Sarpy County Sheriffs of the state of NEBRASKA is legally responsible for the overall safety and security of said plaintiff [FRANK KREEGER III] while in their custody.

5. Defendant Sarpy Co. Sheriffs who arrested me (June 22, 2022 at 8514 S. 100<sup>th</sup> Street La Vista, NE 68128, where on-duty sheriffs held the ranks of Sheriffs.

Defendant ~~Douglas~~ <sup>Douglas</sup> Co. Jail (bottom floor intake) is legally responsible for the well-being of person's in custody at all times.

6. Each defendant [Sarpy County; Douglas County] is sued individually and in his/her official capacity. At all times mentioned in this complaint, each defendant acted wrongfully under state law.

7. On or around the week of June 22<sup>nd</sup>, 2022, I, ~~BB~~ FRANK KREEGER III was arrested at 8514 S. 100<sup>th</sup> St. La Vista NE on an alleged psych warrant and transferred to what I believe to of been Douglas County Jail (bottom floor intake). While present I was changed out into medical pants & shirt. After a certain amount of time more then 5 Sarpy County officers & a nurse came into the room, rushed me and put my hands in cuffs behind my back (so unwillingly inject me with

7. A syringe full of an unknown substance that I believe to be Risperidol. During this inhumane and cruel punishment I was put into a PTSD moment screaming to not rape me. After they administered said substance into my left buttocks they uncuffed ~~me~~, pulled up my pants and rolled me over and left. I had went into a deep sleep (was arrested at around 10 cm ≈ 12 pm) but wasn't ~~wake~~ awake until ~~night~~ late night or early a.m. on the 23<sup>rd</sup> of June (from a medical ambulance women), stating she was there to transfer me (I'm currently being sued for that ambulance ride also). Upon that ride I was taken and booked into the Douglas County Mental Facility where I was there for 2 weeks. I'd like it to be known that I have Schizophrenia, paranoid, bi-polar, ADHD. I met my doctor/psychiatrist from that visit [Dr. Kablesh]

8. Unfortunately I'm unable to give names of said sheriffs but I have faith the video evidence combined with a search of on-duty sheriffs who answered to call of the psychological warrant and at said facility will corroborate my story. It is upon information and belief all this statement is 100% true and accurate  
Exhibit[A] is a case example against [Douglas County Sheriffs]

#### IV LEGAL CLAIMS

The [administering without permission an unknown substance, the utter violation of my 1<sup>st</sup> & 8<sup>th</sup> amendment rights]

, deliberate indifferences to my mental illnesses needs, unsafe ~~&~~ treatment while in their custody violated plaintiff [FRANK KREEGER~~S III~~] rights and constituted [1st, 8th] [cruel & unusual punishment]

10. The plaintiff has no plain, adequate, or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and ~~injustice~~ injunctive relief which plaintiff seeks

## V. PRAYER FOR RELIEF

WHEREFORE, plaintiff prays that this court enter judgement granting plaintiff

11. A declaration that the acts and omissions described herein violated plaintiff's right under the Constitution and Laws of the United States.

12. A preliminary and permanent injunction ordering defendants [Douglas County Jail; Sarpy County Sheriffs] to ~~stop~~ stop violating plaintiff & future arrestees Constitue Rights] ~~\$20 million~~

13. Compensation damages in the amount of ~~\$1 million~~ against each defendant, jointly and separately

14. Punitive damages in the amount of \$10 million against each defendant. (\$10 million against Sarpy County, \$10 million against Douglas County Jail).

15. A jury trial in all issues triable by Jury.

16. Plaintiffs cost in this suit

17. Any additional relief the court deems just, proper, and equitable

1-28-24

Respectfully submitted

FRANK KREEGER III  
c/o Sarpy County Jail  
1206 Golden Gate Drive  
Papillion NE 68046

I have read the foregoing complaint and hereby verify that the matters alleged therein are true except as to matter alleged on information and belief, and as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct

Executed at Omaha, Nebraska on 1-28-24

Frank Edward Kreeger III

Frank Edward Kreeger III  
5

# Exhibit A

GARY LAMONT ABRAHAM

v

DOUGLAS COUNTY SHERIFFS DEPT.

Dated: October 14, 2011

## 1) Summon of Complaint

Plaintiff filed his complaint against one defendant, the Douglas County Nebraska Sheriff's Dept. (Filing No. 1 at CM/ECF)

I Plaintiff was awarded compensation in the amount of \$20 million dollars

Sarpy County Correctional Facility  
Frank Kreeger III #201330  
1206 Golden Gate Drive  
Papillion, NE 68046

SARPY COUNTY DEPARTMENT OF CORRECTIONS  
OUTGOING MAIL

OMAHA NE 680

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U.S. DISTRICT COURT

Office of the Clerk  
United States District Court  
Roman L. Hruska U.S. Courthouse  
111 S. 18<sup>th</sup> Plaza Suite 1152  
Omaha, NE 68102-1322

68102-132277

